

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RICHARD SIERRA, VERONICA GOOCH,)	
ROLAND SIERRA, LUCIA LLERAS DE)	
LABRADA, PRISCILLA LLERAS-BUSH, in)	
her personal capacity and as Personal)	
Representative of the ESTATE OF OLGA)	
ROMAGOSA, and SUZETTE NICOLE)	
NEYRA HENRICK in her capacity as)	
Independent Executor of the Estate of Angela)	C.A. No. 22-366 (JLH)(CJB)
Romagosa Fernandez,)	CONSOLIDATED
)	
Plaintiffs,)	
)	
v.)	
)	
TRAFIGURA TRADING LLC and)	
TRAFIGURA GROUP PTE. LTD.,)	
)	
Defendants.)	

**DEFENDANTS TRAFIGURA TRADING LLC AND TRAFIGURA GROUP PTE LTD.’s
FED. R. CIV. P. 7.1 DISCLOSURE**

Defendants, Trafigura Trading, LLC (“TTL”) and Trafigura Group PTE Ltd. (“TGPL”), pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, submits the following:

1. Defendant TTL, a Delaware limited liability company, is directly owned by Trafigura U.S., Inc. (“TUSI”)¹, and is ultimately owned indirectly by TGPL, a Singapore company.
2. Defendant TGPL, a Singapore company, is the reference parent company and consolidating entity for the Trafigura “Group” of companies, of which TTL is a part.
3. The Trafigura Group of companies operates within a private company structure and as an employee-owned company. The Trafigura Group of companies is exclusively owned by its management and key senior employees.

¹ TUSI is the highest level Trafigura entity in the United States.

4. None of the entities identified above is publicly traded and no publicly-held corporation owns 10% or more of their stock.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

OF COUNSEL:

Alex J. Brackett
Caroline Schmidt Burton
Juliet B. Clark
MCGUIRE WOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916
(804) 775-1000

Andrew Thornton-Dibb
MCGUIRE WOODS LLP
88 16th Street N.W., Suite 500
Black Lives Matter Plaza
Washington, DC 20006
(202) 857-1700

Jack B. Blumenfeld (#1014)
Michael J. Flynn (#5333)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
mflynn@morrisnichols.com

Attorneys for Defendants

February 2, 2024

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on February 2, 2024, upon the following in the manner indicated:

Michael L. Vild, Esquire
CROSS & SIMON, LLC
1105 North Market Street, Suite 901
Wilmington, DE 19801
Attorneys for Plaintiffs

VIA ELECTRONIC MAIL

David A. Baron, Esquire
Melvin White, Esquire
Laina C. Lopez, Esquire
Jared R. Butcher, Esquire
BERLINER CORCORAN & ROWE LLP
1101 17th Street, N.W., Suite 1100
Washington, D.C. 20036-4798
Attorneys for Plaintiffs

VIA ELECTRONIC MAIL

Richard W. Fields, Esquire
Martin F. Cunniff, Esquire
Edward Han, Esquire
FIELDS PLLC
1701 Pennsylvania Avenue, N.W., Suite 200
Washington, D.C. 20006
Attorneys for Plaintiffs

VIA ELECTRONIC MAIL

/s/ Michael J. Flynn

Michael J. Flynn (#5333)